

**Received via email on August 15, 2005:**

The Port of Vancouver has reviewed the proposed Phase II Municipal Stormwater Permit and would like to comment on the Section S8 (6) draft language.

DRAFT LANGUAGE - S8(6):

Identify areas of industrial activity served by the Secondary Permittee's MS4 that require coverage under the Industrial General Permit, determine whether coverage has been obtained, and inform the Department if coverage has not been obtained.

COMMENT:

The proposed language under S8 (6) elevates Port authorities from a landlord to regulatory role and threatens to degrade the customer relationship that has been developed over the years. At the Port of Vancouver, we have practiced a Visual Environmental Audit program that focuses on risk prevention and technical assistance to tenants. If a tenant requires coverage for an Industrial General NPDES Permit we will request that the tenant contact Ecology directly. This reinforces our customer relationship and allows the tenant to contact Ecology. Thus for Section S8 (6) we request that leeway be allowed to have the activity operator contact Ecology rather than the Secondary Permittee.

Thank you for the opportunity to comment.

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